

Cameron Ramelli, OSB No. 174417

e-mail: cameron@ramellilaw.com

RAMELLI LAW LLC

4900 SW Griffith Dr. Suite 165

Beaverton, OR 97005

T: (503) 536 – 5164

F: (503) 662 – 6016

Attorney for Plaintiff

UNITED STATE DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

MATTHEW THOMPSON,

Plaintiff,

v.

KC CARE LLC,

Defendant.

Case No. 3:18-CV-00363-YY

**JOINT MOTION OF VOLUNTARY
DISMISSAL OF PLAINTIFF'S CLAIM
WITH PREJUDICE AND JOINT
MOTION OF VOLUNTARY DISMISSAL
OF DEFENDANT'S COUNTERCLAIMS
WITHOUT PREJUDICE**

//

//

//

//

//

//

//

**Page 1 - JOINT MOTION OF VOLUNTARY DISMISSAL OF PLAINTIFF'S CLAIM
WITH PREJUDICE AND JOINT MOTION OF VOLUNTARY DISMISSAL OF
DEFENDANT'S COUNTERCLAIMS WITHOUT PREJUDICE**

Ramelli Law LLC
4900 SW Griffith Dr. Suite 165
Beaverton, OR 97005
P: (503) 536-5164 F: (503) 662-6016

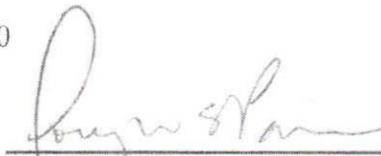
Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Matthew Thompson and Defendant KC Care, LLC, by and through their respective counsel below, hereby stipulate to the dismissal of the above-captioned action. Plaintiff's claim is dismissed with prejudice. Defendant's counterclaims are dismissed without prejudice. Each of the parties shall bear its own costs, attorneys' fees, and all other expenses incurred in connection with this action

RESPECTFULLY SUBMITTED March 13, 2020



Cameron Ramelli, OSB No. 174417
RAMELLI LAW LLC
4900 SW Griffith Dr. Suite 165
Beaverton, OR 97005
Trial Attorney
Tel (503) 536-5164
Fax (503) 662-6016
cameron@ramellilaw.com

Of Attorney for Plaintiff



Douglas S. Parker, OSB No. 821017
LITTLER MENDELSON, P.C.
121 SW Morrison Street, Suite 900
Portland, OR 97204
Telephone: 503.889.8873
Facsimile: 503.242.2457
Email: dparker@littler.com
Attorney for Defendant



Christian Zupancic, OSB No. 135475
ZUPLAW LAW FIRM, LLC
615 Broadway, Suite 216
Seaside, OR 97138
Telephone: 503.747.9836
Facsimile: 503.902.7900
Email: christian@zuplaw.com
Attorney for Defendant